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**Reply to Montclair**

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April 8, 2008

**VIA ELECTRONIC FILING**

The Honorable Claire C. Cecchi, U.S.M.J.  
M.L. King, Jr. Federal Bldg. & Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: Linda Wagoner v. Medco Health Solutions**  
**Docket No.:**  
**Our File No.: 2324**

Dear Judge Cecchi:

We represent the Plaintiff, Linda Wagoner, in the above-referenced matter. Please be so kind as to accept this letter brief in lieu of a more formal brief in support of our motion for leave to amend the complaint. During the continued deposition of Plaintiff today, we were advised by defense counsel that the initial complaint contains errors with regard to the dates of certain incidents related to Ms. Wagoner's termination. In each instance, the year was mistakenly noted as "2006," when the events referenced actually occurred in 2005.

We have attached for the Court's consideration Plaintiff's First Amended Complaint. The year noted in Paragraphs Twenty-Three (23), Forty-Four (44), Forty-Seven (47) and Fifty (50) has been corrected from "2006" to "2005." No other changes have been made to the body of the complaint.

We respectfully request leave to file Plaintiff's First Amended Complaint which corrects these minor administrative errors.

We thank Your Honor for your courtesies.

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Respectfully submitted,  
LAW OFFICES OF TY HYDERALLY, PC



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*for the Firm*

JV

cc: Meghan Barrett, Esq.

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